



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd floor  
New York, New York 10007*

April 14, 2021

**BY ECF**

The Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Takayo Matsui, as mother and natural guardian of K.M., a minor v.  
United States of America*, No. 20 Civ. 7800 (RWL)

Dear Judge Lehrburger:

I write respectfully on behalf of defendant United States of America to request a five-week extension of the fact discovery deadline—from April 19, 2021 to May 24, 2021—in the above-referenced medical malpractice claim brought pursuant to the Federal Tort Claims Act. *See* ECF No. 11. This is the first request for an extension of the fact discovery deadline. Plaintiff consents to this request. The United States seeks additional time to work to obtain responses to previously issued third-party subpoenas and to thereafter schedule the deposition of plaintiff Ms. Matsui. While the United States has received some responses to its third-party subpoenas for medical-related records, we are working to obtain the remaining records sought by other providers.

If the Court grants this request, the United States respectfully requests corresponding five-week extensions of the remaining deadlines in this case: the April 19, 2021 deadline for the parties to meet and confer about the expert discovery schedule would extend to May 24, 2021, and the July 19, 2021 deadline for the completion of expert discovery would extend to August 23, 2021.

We thank the Court for its consideration of this submission.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

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cc: Counsel of record (by ECF)